CHAN & GRANT, LLP ATTORNEYS AT LAW

61 LEXINGTON AVENUE, SUITE 1G NEW YORK, NEW YORK 10010

TELEPHONE (646) 779-2988 FACSIMILE (646) 779-2950

January 16, 2020

The Honorable Ronnie Abrams
U.S. District Court for the Southern District of New York
40 Foley Square, Room 2203
New York, NY 10007



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Re:

Aesha De La Cruz v. American Airlines, Inc. and American Eagle

Airlines, Inc.

Index No. 19-cv-11339-RA

Dear Judge Abrams:

We represent defendants, American Airlines, Inc. and American Eagle Airlines, Inc. in the action commenced by Plaintiff, Aesha De La Cruz. We have spoken with Plaintiff's counsel, James Bacher, Law Office of J Bacher, PLLC, and the parties jointly make a request for an adjournment of the Initial Conference scheduled for January 24, 2020. This is the first request for an adjournment.

Plaintiff had initially served a Complaint on defendant, American Airlines Group Inc. for personal injuries arising from two flights. On December 19, 2020, this honorable court ordered that the parties appear for an Initial Conference on January, 24, 2020, and to submit a Joint Letter and proposed case management plan and scheduling order by January 17, 2020.

By Order of Stipulation of the Parties dated January 7, 2020, the cause of action against American Airlines Group Inc. in Plaintiff's Complaint was discontinued and American Airlines, Inc. and American Eagle Airlines, Inc. was added as defendants in the action. On January 8, 2020, Plaintiff filed her First Amended Complaint against defendants, American Airlines, Inc. and American Eagle Airlines, Inc. By Order of Stipulation of the parties, defendants' answers are due on January 28, 2020, after the date of the Initial Conference

We request an adjournment of the Initial Conference to allow defendants time to file an answer and conduct an investigation to ascertain appropriate defenses to the First Amended Complaint, and to be able to discuss with Plaintiff the issues and defenses of the action. If the Court agrees to the adjournment of the Initial Conference, the parties also request that the submission date of the Joint Letter and proposed case management plan and scheduling

order also be extended to one week prior to the rescheduled Initial Conference date. Defendants respectfully request that if the Court agrees to adjourn the Initial Conference that it not be rescheduled for February 24, 2020, as undersigned counsel has a witness arriving from out of state on another case for a court-ordered deposition. Thank you.

Very truly yours,

/s/ Alice Chan

Alice Chan (AC-0311)
Chan & Grant, LLP
Attorneys for Defendants,
American Airlines, Inc. & American Eagle
Airlines Inc.
61 Lexington Avenue Suite 1 G
New York, NY 10010

Tel: 646-779-2988 Fax: 646-779-2950

alice.chan@changrant.com

Application granted. The initial conference is adjourned to February 7, 2020 at 2:45 P.M. The parties shall file the joint letter and proposed case management plan by January 31, 2020.

SO ORDERED.

Hon. Ronnie Abrams

1/17/2020